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May 5, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Reporting Requirements for U.S. Providers of International Telecommunications Services, IB Docket No. 04-112

Joint Petition for Rulemaking to Further Reform the International Settlements Policy, RM-11322

Petition Pursuant to Rule 64.1002(d) Requesting Issuance of Settlements Stop Payment Order on the US-Tonga Route, IB Docket No. 09-10

Dear Ms. Dortch:

On May 4, 2011, Eric Loeb, James Talbot and I met with Joshua Cinelli, Media Advisor, and Margaret McCarthy, Policy Advisor, to Commissioner Copps, and with Angela Giancarlo, Chief of Staff and Senior Legal Advisor to Commissioner McDowell, in connection with the above-referenced proceedings. In addition, Mr. Talbot and I also met with Charles Mathias, Senior Legal Advisor, and Rafi Martina, Legal Fellow, in the office of Commissioner Baker.

During these meetings, AT&T expressed its support for the streamlining of the Section 43.61 International Traffic and Section 43.82 Circuit Status Reports, and removal of the International Settlements Policy ("ISP") and its associated filing requirements from the remaining international routes on which this policy still applies.

AT&T expressed its support for measures to streamline the Part 43 international reporting requirements as proposed in the April 2004 Notice of Proposed Rulemaking, in addition to the further streamlining measures proposed by the International Bureau staff in 2006 after discussions with U.S. international carriers, as detailed in the attached handout. In particular, we noted that the quarterly 43.61 reports, which AT&T estimates require approximately 33 hours of work by AT&T personnel per quarter and substantially exceed the estimated response time of two hours listed in the *Federal Register* pursuant to the Paperwork Reduction Act for this report, no longer serve any regulatory purpose and should be eliminated.

Similarly, we noted that the reporting of submarine cable circuits in the 43.82 report is unnecessary to calculate regulatory fees following the Commission's 2009 regulatory fee reform. In addition, as a result of the significant expansion of submarine cable capacity since the mid 1990s, and particularly of non-common carrier capacity, circuits reported under Section 43.82 represent only approximately 10% of total U.S. submarine cable capacity. The collection of this limited circuit data provides no basis for competitive analysis and serves no other remaining regulatory purpose. As follow up to the meetings, we provide the attached April 21, 2011 ex parte filed by AT&T that further describes how the burden to comply with these requirements is disproportionately high compared to the benefit of this extensive data collection in today's changed regulatory environment and competitive global marketplace.

In regard to the issue of ISP reform, we noted the benefits to U.S. consumers, as demonstrated in the attached chart, from the Commission's 2004 reform of the ISP on routes accounting for 98 percent of U.S. international traffic. We expressed our support for the commencement of a rulemaking to extend these reforms to all U.S. international routes and to adopt expedited competitive safeguards procedures to address any future anticompetitive conduct by foreign carriers.

In regard to the Settlements Stop Payment Order on the U.S.-Tonga Route, we provided a brief overview of the developments leading up to the disruption of AT&T's circuits on this route, which remain unconnected, and we reiterated AT&T's support for the enforcement of the \$0.19 benchmark rate on U.S.-Tonga calls routed via third countries, as a further remedy.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez". The signature is fluid and cursive, with a large, stylized "A" and "L".

cc: Joshua Cinelli
Angela Giancarlo
Charles Mathias
Margaret McCarthy
Rafi Martina